

Fred W. Schwinn (SBN 225575)
CONSUMER LAW CENTER, INC.
12 South First Street, Suite 1014
San Jose, California 95113- 2418
Telephone Number: (408) 294-6100
Facsimile Number: (408) 294-6190
Email Address: fred.schwinn@sjconsumerlaw.com

Attorney for Plaintiff
RAMONA PATRICIA CARDON

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

RAMONA PATRICIA CARDON,

Plaintiff,

v.

PHILLIPS & COHEN ASSOCIATES, LTD.,
a New Jersey corporation,

Defendant.

Case No. C08-00926-JW-PVT

**PLAINTIFF'S NOTICE OF
DISCOVERY PROPOUNDED TO
DEFENDANT, PHILLIPS & COHEN
ASSOCIATES, LTD.**

COMES NOW the Plaintiff, RAMONA PATRICIA CARDON, by and through counsel, Fred W. Schwinn of the Consumer Law Center, Inc., and hereby notifies the Court that on the 30th day of June, 2008, Interrogatories numbered 1 through 17 inclusively, have been submitted for answer by Defendant, PHILLIPS & COHEN ASSOCIATES, LTD., in accordance with Rule 33 of the Federal Rules of Civil Procedure, within thirty (30) days from the date of service thereof.

You will please take notice that the party filing these Interrogatories demands answers under oath in accordance with the rules of civil procedure. These Interrogatories are continuing and require supplemental answers if additional information is obtained between the time of answering and the time of trial.

ADDITIONALLY, Plaintiff notifies the Court that she has also served a Request for Production of Documents in accordance with Rule 34 of the Federal Rules of Civil Procedure containing 20 paragraphs upon Defendant, PHILLIPS & COHEN ASSOCIATES, LTD., and that

1 these discovery requests are to be responded to within thirty (30) days.

2 ADDITIONALLY, Plaintiff notifies the Court that she has also served a Request for
3 Admissions in accordance with Rule 36 of the Federal Rules of Civil Procedure, containing 10
4 paragraphs upon Defendant, PHILLIPS & COHEN ASSOCIATES, LTD., and that these discovery
5 requests are to be responded to within thirty (30) days.

6
7 CONSUMER LAW CENTER, INC.

8 By: /s/ Fred W. Schwinn
9 Fred W. Schwinn (SBN 225575)
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11 San Jose, California 95113-2418
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13 Facsimile Number: (408) 294-6190
14 Email: fred.schwinn@sjconsumerlaw.com
15 Attorney for Plaintiff

16
17 **CERTIFICATE OF SERVICE**

18 The undersigned, Fred W. Schwinn, does hereby certify that he caused a true and correct
19 copy of the above and foregoing document to be deposited in the United States mail, postage
20 prepaid, addressed to the following:

21 Liam J. O'Connor
22 Ericksen, Arbuthnot, Kilduff, Day & Lindstrom, Inc.
23 152 North Third Street, Suite 700
24 San Jose, CA 95112
25 Attorney for Defendant

26 on this, the 30th day of June, 2008.

27 /s/ Fred W. Schwinn
28 Fred W. Schwinn